

TROY LAW, PLLC

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March 28, 2022

Via ECF

Hon. John P. Cronan, U.S.D.J.
United States District Court
Southern District of New York
500 Pearl St.
New York, NY 10007-1312

**Re: First Letter Motion for Extension of Time to File Supplemental Party Declaration until
April 11, 2022, from March 28, 2022**
1:17-cv-07066-JGK Zhang et al v. Hiro Sushi at Ollies Inc. et al

Dear Judge Cronan:

This office represents Plaintiffs in the above referenced matter. Plaintiffs write respectfully to request a two-week extension of time to file Plaintiff Genxiang Zhang's Supplemental Party Declaration in further support of his damages for the period from September 01, 2015, through December 25, 2015. This is our first request for an extension of time to file the supplemental declaration in further support of his damages and granting this request will not prejudice any party since the Defendants are currently in default.

On March, 24, 2022, Your Honor, ordered Plaintiffs' counsel to file a supplemental party declaration from Plaintiff Genxiang Zhang by March 28, 2022. *See* Dkt. No. 159. However, the undersigned will not be able to timely file the supplemental party declaration by March 28, 2022. The reason for the delay is that Plaintiff Genxiang Zhang is currently living outside of New York State. As Plaintiff Genxiang Zhang is a full-time immigrant worker, he does not have the luxury of being able to request time off and travel between States in a short time frame. With such short notice, the Plaintiffs' counsel was also not able to schedule an appointment with Plaintiff Genxiang Zhang to supplement the affidavit in further support of Plaintiff Zhang's employment with the Defendants' for the period September 01, 2015, through December 25, 2015.

Additionally, Plaintiff's Counsel respectfully requests a two weeks' extension of time to submit the supplemental paperwork, since Plaintiff's counsel has upcoming Trials in other matters which has already taken up a significant amount of resources within the firm.

For the foregoing reason, the undersigned respectfully requests Your Honor to allow a two-week extension of time to file Plaintiff Genxiang Zhang's declaration in further support of his damages for the period from September 1, 2015, to December 25, 2015.

Hon. John P. Cronan, U.S.D.J.
Southern District of New York
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We sincerely apologize for the delay and thank the Court for its time and kind consideration of this matter.

Respectfully Submitted,

TROY LAW PLLC
Attorneys for Plaintiffs

/s/ John Troy
John Troy, Esq.


Cc: All Counsel of Record *Via* ECF

tcs pk/JT

Plaintiffs shall appear for a telephone conference on March 29, 2022 at 10:00 a.m. to discuss their request for extension of time to file Plaintiff Genxiang Zhang's supplemental party declaration. At the scheduled time, counsel should call (866) 434-5269, access code 9176261.

SO ORDERED.

Date: March 28, 2022
New York, New York


JOHN P. CRONAN
United States District Judge